

## REMARKS

Applicants respectfully request reconsideration of this application as amended. Claims 1, 4, 6, 8, 10, 14, 35, 37 and 38 have been amended. Claims 2-3, 5, 7, 9, 11-13, 15-34, 36 and 39-44 have been cancelled without prejudice. New claims 45-49 have been added. Therefore, claims 1, 4, 6, 8, 10, 14, 35, 37-38 and 45-49 are presented for examination.

### 35 U.S.C. § 102 Rejection

Claims 1-42 are rejected under 35 U.S.C. §102(e) as being anticipated by Kuansan, et al., European Application No. EP 1 255 194 (“Kuansan”).

Claim 1, as amended, recites:

A method comprising:

interpreting user input received at a client mobile device from a user, the interpreting including identifying a selection of at least one of a plurality of web interaction modes, each of the plurality of web interaction modes to perform interpretation of content on a server computer system and a client mobile device coupled with the server computer system, the plurality of web interaction modes including a focus mechanism;

identifying, via the focus mechanism, an active display element associated with the user input, and focusing the client mobile device on the active display element;

receiving, at the server computer system, a speech identifier of the identified focused display element; and

recognizing speech associated with the user input based on evaluating a corresponding relationship between the display element and a speech element of the speech.

(emphasis added)

Kuansan disclose “a *markup language* for execution on a client device in a client/server system includes extensions for recognition.” (Abstract; emphasis added).

Kuansan further discloses “the *extensions may be interpreted in two different ‘modes’ according to the capabilities of the device* upon which the browser is being executed on . . . [for example, in] a *first mode, ‘object mode’, the full capabilities are available.*

(paragraph 0043; emphasis provided).

Kuansan's technique relates to employing a *markup language for execution* on a client device and the *different modes* of Kuansan *are based on the capabilities of the client device*. For example, Kuansan further discloses "[t]he extensions can also be supported in a 'declarative mode' . . . [such as] a browser operating in a declarative mode is called a 'downlevel browser' and does not support full eventing and scripting capabilities." (paragraph 0044; emphasis added).

In contrast, claim 1, as amended, recites "interpreting user input received at a client mobile device from a user, the interpreting including identifying a selection of at least one of a plurality of web interaction modes, each of the plurality of *web interaction modes to perform interpretation of content* on a server computer system and a client mobile device . . . the plurality of web interaction modes including a *focus mechanism*". (emphasis added). Claim 1 further recites "identifying, via the focus mechanism, an active display element associated with the user input, and focusing the client mobile device on the active display element". (emphasis added).

Kuansan's modes relate to the capabilities of the client device but do not relate to having web interaction modes and choosing at least one of the web interaction mode to perform content interpretation on server and client systems and, more specifically, identifying an active display as recited by claim 1. Consequently, Kuansan does not teach or reasonably suggest "receiving, at the server computer system, a speech identifier of the identified focused display element; and recognizing speech associated with the user input based on evaluating a corresponding relationship between the display element and a speech element of the speech" as recited by claim 1. (emphasis added). Accordingly, Applicants respectfully request the withdrawal of the rejection of claim 1 and its dependent claims.

Claim 35 contains limitations similar to those of claim 1. Accordingly, for at least the same reasons as set forth above with respect of claim 1, Applicants respectfully request the withdrawal of the rejection claim 35 and its dependent claims.

### **New Claims**

New independent claim 45 contains limitations similar to those of claim 1. Accordingly, Applicants contend that claim 45 and its dependent claims are allowable over the cited reference.

### **Conclusion**

In light of the foregoing, reconsideration and allowance of the claims is hereby earnestly requested.

### **Invitation for a Telephone Interview**

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

### **Request for an Extension of Time**

Applicants respectfully petition for a one month extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a). Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17(a) for such an extension.

### **Charge our Deposit Account**

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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